III.   REMARKS

In the Office Action mailed on December 4, 2006, the Examiner: (1) objected to the abstract of the disclosure because of a typographical error; (2) objected to the specification for various typographical errors; (3) objected to claims 3-9 because of informalities; (4) rejected claims 10-37 under 35 U.S.C. § 112 as indefinite for failing to point out and distinctively claim the subject matter which applicant regards as the invention; (5) rejected claims 1-23 and 38-41 under 35 U.S.C. § 101 as being directed to non-statutory subject matter; (6) rejected claims 1-4, 9-16, 21-15, and 35-41 under 35 U.S.C. § 103(a) as being unpatentable over Eisenstein et al., "Applying Model-Based Techniques to the Development of UIs for Mobile Computers," 2001 (hereinafter "Eisenstein") in view of Puerta et al., "Towards a General Computational Framework for Model-Based Interface Development Systems," 1999 (hereinafter "Puerta"); and (7) rejected claims 5-8, 17-20, and 26-34 under 35 U.S.C. § 103(a) as unpatentable over Eisenstein in view of Puerta as applied to claims 4, 16, and 25 and further in view of U.S. Patent No. 6,243,713 to Nelson (hereinafter "Nelson"). In response, Applicants have amended the specification, canceled the original claims, and presented new claims 42 – 80 as explained below.

A.   Explanation of Applicants' Amendments to the Specification

In Sections I-A through I-F, *supra*, Applicants have amended the specification to correct the various typographical errors to overcome the Examiner's objections. In Sections I-G through I-J, *supra*, Applicants have amended the specification to summarize the newly presented claims. The subject matter of paragraphs [0007] – [0010] corresponding to the newly presented claims is supported generally throughout the specification as originally filed, including, but not limited to: (1) original Figures 2, 3A, and 3B; (2) original paragraphs [0019] – [0020] (interactive design system), [0021] – 0027] (domain model), [0028] – [0031] (user model), [0032] – [0038] (task model), [0039] – [0043] (device model), [0044] – [0048] (presentation elements library), [0049] – [0065] (generating a set of presentations), and [0060] (displaying presentations); and (3) original claims 1 (receiving), 10 (creating), 24 (storing), and 38 (computer readable media).

B.   Explanation of Applicants' Newly Presented Claims

Of the 39 total newly presented claims, 4 claims are independent. The originally filed application had 41 claims, 4 of which were independent. The subject matter of newly presented claims 42 – 80 is supported generally throughout the specification as originally filed, including, but not limited to: (1) original Figures 2, 3A, and 3B; (2) original paragraphs [0019] – [0020] (interactive

McDONNELL BOEHNEN HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE
CHICAGO, ILLINOIS 60606   16   HONEYWELL DOCKET No.: H0003511-1633 US
MBHB DOCKET NO.: 06-963-0
S/N: 10/507,024

PAGE 17/19 * RCVD AT 3/5/2007 4:23:14 PM [Eastern Standard Time] * SVR:USPTO-EFXRF-1/17 * DNIS:2738300 * CSID:312 913 0002 * DURATION (mm-ss):06-18

design system), [0021] – 0027] (domain model), [0028] – [0031] (user model), [0032] – [0038] (task model), [0039] – [0043] (device model), [0044] – [0048] (presentation elements library), [0049] – [0065] (generating a set of presentations), and [0060] (displaying presentations); and (3) original claims 1 (receiving), 10 (creating), 24 (storing), and 38 (computer readable media). Newly presented claims 42 – 80 overcome the Examiner's rejections under 35 U.S.C. §§ 101, 112, and 103(a) for the reasons set forth below.

1. Response to Examiner's 35 U.S.C. § 101 Rejection

Newly presented independent claims 42, 52, 62, and 72 each recite, *inter alia*, "generating a set of presentations...", and "displaying the set of presentations..." Generating and displaying a set of presentations is a specific, substantial, and credible utility that produces a useful and tangible result and thus, Applicants submit that claims 42, 52, 62, and 72 are drawn to statutory subject matter. Claims 43 – 51 depend from claim 42, claims 53 – 61 depend from claim 52, claims 63 – 71 depend from claim 62, and claims 73 – 80 depend from claim 72. Therefore, Applicants further submit that newly presented claims 43 – 51, 53 – 61, 63 – 71, and 73 – 80 comply with 35 U.S.C. § 101 for at least the reason that their base claims comply with 35 U.S.C. § 101.

2. Response to Examiner's 35 U.S.C. § 112 Rejection

Applicants have cancelled original claims 10-37. Applicants submit that newly presented claims 42 – 80 comply with 35 U.S.C. § 112 because the newly presented claims particularly point out and distinctly claim the subject matter which applicant regards as the invention.

3. Response to Examiner's 35 U.S.C. § 103(a) Rejection

Applicants have cancelled original claims 1-41 and have presented new claims 42 – 80. Newly presented independent claims 42, 52, 62, and 72 each recite, *inter alia*, "generating a set of presentations, wherein each presentation in the set of presentations comprises an interaction delivery device and a display object that meets the requirements of the interaction delivery device, wherein the interaction delivery device is selected from the set of interaction delivery devices in the device model that meets the user requirements defined by the user model and the task requirements defined by the task model, and wherein the display object is selected from the set of display objects in the presentation elements library that meets the task requirements defined by the task model and the application requirements defined by the domain model." Eisenstein and Puerta do describe

McDONNELL BOEHNEN HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE
CHICAGO, ILLINOIS 60606

17

HONEYWELL DOCKET NO.: H0003511-1633 US
MBHB DOCKET NO.: 06-9253-D
S/N: 10/507,024

creating a user interface through mapping various component attributes in various models, such as: (1) "platforms...and tasks" (Eisenstein, pg. 74); (2) "task elements and presentation structures that are optimized for a given set of tasks" (Eisenstein, pg. 74); (3) "users to tasks" (Puerta, pg. 174); and (4) "objects to tasks" (Puerta, pg. 174). However, Applicants find nothing in Eisenstein's or Puerta's description of mapping processes that disclose generating a set of presentations having the particular characteristics disclosed in newly presented claims 42, 52, 62, and 72. In particular, the combination of Eisenstein and Puerta does not disclose "a set of presentations" where each "presentation in the set of presentations comprises an interaction delivery device and a display object that meets the requirements of the interaction delivery device" where the "interaction delivery device" component of each presentation "meets the user requirements defined by the user model and the task requirements defined by the task model" and where the "display object" component of each presentation "meets the task requirements defined by the task model and the application requirements defined by the domain model." Therefore, Applicants submit that claims 42, 52, 62, and 72 are patentable over the combination of Eisenstein and Puerta for at least the reason that the Eisenstein-Puerta combination fails to teach each and every element recited in the claims.

Claims 43 – 51 depend from claim 42, claims 53 – 61 depend from claim 52, claims 63 – 71 depend from claim 62, and claims 73 – 80 depend from claim 72. Therefore, Applicants further submit that newly presented claims 43 – 51, 53 – 61, 63 – 71, and 73 – 80 are allowable over the combination of Eisenstein and Puerta for at least the reason that their base claims are allowable over the combination of Eisenstein and Puerta.
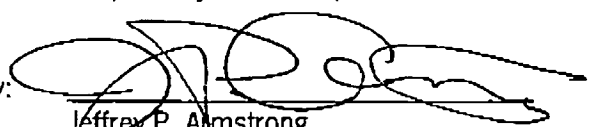
IV.   CONCLUSION

Applicants submit that the present application is in condition for allowance, and notice to that effect is hereby requested. Should the Examiner feel that further dialog would advance the subject application to issuance, the Examiner is invited to telephone the undersigned at (312) 913-2104.

Respectfully submitted,

Dated: March 5, 2007   By:

Jeffrey P. Armstrong
Reg. No. 54,967

McDONNELL BOEHNEN HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE
CHICAGO, ILLINOIS 60606

18

HONEYWELL DOCKET NO.: H0003511-1633 US
MBHB DOCKET NO.: 06-963-D
S/N: 10/507,024

PAGE 19/19 * RCVD AT 3/5/2007 4:23:14 PM [Eastern Standard Time] * SVR:USPTO-EFXRF-1/17 * DNIS:2738300 * CSID:312 913 0002 * DURATION (mm-ss):06-18